

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION

BRADLEY J. SCHAUFENBUEL; ROBERT N.)
SCHAUFENBUEL; JOHN AND SARAH REED,)
IV; JOHN AND JAN REED, III; AMERICAN)
MASS MEDIA CORPORATION; ROBERTA K.)
CLARK; on behalf of Themselves and All Others)
Similarly Situated)

Plaintiffs,)

v.)

Case No. 09-cv-1221

The Honorable Judge Leinenweber

INVESTFORCLOSURES FINANCIAL, L.L.C)
ROI DEVELOPERS; INVESTFORCLOSURES;)
INVESTFORCLOSURES.COM, LLC;)
INVESTFORCLOSURES VENTURES; LLC)
SANDS OF GOLD ESCROW; SANDS OF GOLD;)
ROI FINANCIAL; REALTY OPPORTUNITIES)
INTERNATIONAL ESCROW 23; ROI ESCROW;)
REALTY OPPORTUNITIES INTERNATIONAL)
S. de R.L. de C.V; REALTY OPPORTUNITIES)
INTERNATIONAL; ROI MEXICO; SANDS OF)
GOLD ESTATES; FRANCIS X. SANCHEZ)
aka FRANK SANCHEZ; JAMES D. BOURASSA)
aka JIM BOURASSA; SCOTT D. WESSEL;)
DEANA M. GUIDI; DANIEL E. FITZGERALD)
aka DAN FITZGERALD; SCOTT R. SLAGLE;)
DARCEY L. MARTIN; TOM RODRIGUEZ; and)
JOHN DOES 1-30.)

Defendants.)

NOTICE OF MOTION

To: See Attached Service List

PLEASE TAKE NOTICE that on the 2nd day of June, 2009 at 9:30 a.m. or as soon thereafter as counsel may appear, I shall appear before the Honorable Judge Harry D. Leinenweber in Room 1941 of the U.S. District Court located at 219 S. Dearborn Street, Chicago, IL and then and there request hearing on the Defendant's Motion to Dismiss, a copy of which is herewith served upon you.

Respectfully submitted,

By: /s/Russell W. Baker

Charles A. Dunlop ARCD#6180628

Russell W. Baker ARDC #6287995

Genevieve Lynott ARDC #6275407

Campion, Curran, Dunlop & Lamb, P.C.

8600 U. S. Hwy 14, #201

Crystal Lake, IL 60012

CERTIFICATE OF SERVICE

I, Russell W. Baker, an attorney, hereby certify that I caused copies of the foregoing Defendant Darcey L. Martin's, Deana M. Guidi's, and Tom Rodriguez' Motion to Dismiss to be served upon all persons on the attached Service List, via electronic filing on May 20, 2009. A courtesy copy of this motion and all exhibits will be delivered via Federal Express upon the Honorable Judge Harry D. Leinenweber on May 21, 2009.

/s/ Russell W. Baker

CAMPION, CURRAN, DUNLOP & LAMB, P.C.
Attorneys for Defendant Deana Guidi, Darcey Martin and Tom Rodriguez
8600 U.S. Highway 14, Suite 201
Crystal Lake, IL 60012-2759
(815) 459-8440
Fax (815) 455-8134